

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

BAY STATE GAS COMPANY

D.T.E. 05-27

ATTORNEY GENERAL'S SIXTEENTH SET OF
DOCUMENT AND INFORMATION REQUESTS

The following are the Attorney General's SIXTEENTH SET of discovery and information requests regarding the prefiled testimony of Mr. Robinson.

AG-16-1 Please provide the following information for the Company's coated steel mains with cathodic protection:

- (1) the test-year end balance of plant in service;
- (2) the test-year end balance of accumulated depreciation;
- (3) the year-by-year dollar amounts and footage amounts of additions of that type of main to plant in service from the date that it was originally installed on the Company's system;
- (4) the year-by-year dollar amounts and footage amounts of retirements from the date that type of main was originally installed on the Company's system;
- (5) an Observed Life Table for that type of main similar to that prepared by Mr. Robinson; and
- (6) an Original and Smooth Survivor Curve for that type of main similar to that prepared by Mr. Robinson.

AG-16-2 Please provide the following information for the Company's coated steel mains without cathodic protection:

- (1) the test-year end balance of plant in service;
- (2) the test-year end balance of accumulated depreciation;
- (3) the year-by-year dollar amounts and footage amounts of additions of that type of main to plant in service from the date that it was originally installed on the Company's system;
- (4) the year-by-year dollar amounts and footage amounts of retirements from the date that type of main was originally installed on the Company's system;
- (5) an Observed Life Table for that type of main similar to that prepared by Mr. Robinson; and
- (6) an Original and Smooth Survivor Curve for that type of main similar to that prepared by Mr. Robinson.

DATED: June 9, 2005.